

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL PHILIP DOWD,

INDICTMENT

Defendant.

_____ /

The Grand Jury charges:

COUNT 1
(Aggravated Sexual Abuse)

Between on or about April 8, 2024, and on or about April 9, 2024, in Baraga County, on land held in trust by the United States for the Keweenaw Bay Indian Community, in the Northern Division of the Western District of Michigan, the defendant,

MICHAEL PHILIP DOWD,

an Indian, knowingly engaged in a sexual act, that is, the penetration, however slight, of the genital opening of Victim 1, an Indian female, by a hand or finger, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, by using force, in that he used his body to hold Victim 1 down and penetrated her genital opening with his hand.

18 U.S.C. § 2241(a)(1)

18 U.S.C. § 2246(2)(C)

18 U.S.C. § 1151

18 U.S.C. § 1153

COUNT 2
(Sexual Abuse)

Between on or about April 8, 2024, and on or about April 9, 2024, in Baraga County, on land held in trust by the United States for the Keweenaw Bay Indian Community, in the Northern Division of the Western District of Michigan, the defendant,

MICHAEL PHILIP DOWD,

an Indian, knowingly engaged in a sexual act with Victim 1, an Indian female, that is, the penetration, however slight, of the genital opening of Victim 1 by his hand and finger with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person, and contact between his mouth and Victim 1's anus, without Victim 1's consent and while Victim 1 was incapable of appraising the nature of the conduct and physically incapable of declining participation in, or communicating unwillingness to engage in, that sexual act.

18 U.S.C. § 2242(2), (3)
18 U.S.C. § 2246(2)(B), (C)
18 U.S.C. § 1151
18 U.S.C. § 1153

A TRUE BILL

[/s/ Redacted]
GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



JACOB S. METOXEN
Assistant United States Attorney